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Exhibit I

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11

MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (REG)

f/k/a General Motors Corp., et al.

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Debtors. : (Jointly Administered)

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ORDER GRANTING MOTION OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION (MONETARY RELIEF ACTIONS, OTHER THAN IGNITION SWITCH ACTIONS)

Upon the Motion, dated August 1, 2014 ("Motion"), of General Motors LLC ("New GM"), pursuant to Sections 105 and 363 of the Bankruptcy Code, seeking the entry of an order to enforce the Sale Order and Injunction, entered by the Court on July 5, 2009, by directing the Plaintiffs in the Monetary Relief Actions to (a) cease and desist from further prosecuting against New GM claims that are barred by the Sale Order and Injunction, (b) dismiss with prejudice those void claims because they were brought by the Plaintiffs in violation of the Sale Order and Injunction, and (c) specifically identify which claims against New GM they believe are not otherwise barred by the Sale Order and Injunction, all as more fully set forth in the Motion; and due and proper notice of the Motion having been provided to counsel for the Plaintiffs, Designated Counsel, counsel for the Groman Plaintiffs, counsel for the GUC Trust, counsel for the GUC Trust Unitholders, and the U.S. Trustee, and it appearing that no other or further notice need be given; and upon (i) this Court having jurisdiction to consider the relief requested in the Motion pursuant to 28 U.S.C. §§ 157 and 1334, and Paragraph 71 of the Sale Order and Injunction, (ii) the relief requested in the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b), and (iii) venue of the Motion before this

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Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

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Court being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and a hearing (the "Hearing") having been held with respect to the Motion on ________, 2014; and upon the record of the Hearing, the Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore

THE COURT FINDS AND DETERMINES THAT

- 1. The Court has jurisdiction to consider the relief requested in the Motion pursuant to 28 U.S.C. §§ 157 and 1334, and Paragraph 71 of the Sale Order and Injunction.
- 2. The relief requested in the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b).
- 3. The claims and/or causes of action asserted against New GM in the Monetary Relief Actions that concern vehicles and/or replacement parts designed, manufactured and/or sold by Old GM are Retained Liabilities, including, without limitation, claims or causes of action that are based on (a) express warranty, other than the Glove Box Warranty, (b) implied warranty, (c) implied obligations under statute or common law, (d) successor liability, (e) design defect, (f) tort, contract or otherwise, or (g) the conduct of Old GM.
- 4. The Plaintiffs were given the opportunity to show cause why any of the claims and/or causes of action asserted against New GM in the Monetary Relief Actions that concern vehicles and/or replacement parts designed, manufactured and/or sold by Old GM do not constitute Retained Liabilities, and Plaintiffs have been unable to provide satisfactory evidence demonstrating that any of such claims and/or causes of action asserted against New GM in the Monetary Relief Actions should not be barred and enjoined.

NOW, THEREFORE, IT IS HEREBY

ORDERED that the Motion is GRANTED as set forth herein; and it is further

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ORDERED that the Plaintiffs shall dismiss, with prejudice, on or before , 2014,

the claims and/or causes of action asserted against New GM in the Monetary Relief Actions that

concern vehicles and/or replacement parts designed, manufactured and/or sold by Old GM; and it is

further

ORDERED that the Plaintiffs and all persons acting in concert with them shall cease and

desist from prosecuting the claims and/or causes of action asserted against New GM in the

Monetary Relief Actions that concern vehicles and/or replacement parts designed, manufactured

and/or sold by Old GM; and it is further

ORDERED that, within 10 business days after the entry of this Order, each of the Plaintiffs

shall file with the Clerk of this Court evidence of the dismissal, with prejudice, of their claims

and/or causes of action asserted against New GM in the Monetary Relief Actions that concern

vehicles and/or replacement parts designed, manufactured and/or sold by Old GM; and it is further

ORDERED that New GM shall be authorized to serve this Order upon any additional party

(and/or their attorney) who commences an action ("Additional Action") against New GM that is

substantially similar to the relief requested in the Monetary Relief Actions and, if such additional

party fails or refuses to dismiss, with prejudice, such Additional Action, New GM shall be

permitted to seek expedited relief in this Court seeking, among other things, to hold such party (and

his or her attorney) in contempt of Court for violating this Order, and the Sale Order and Injunction.

Dated: _____, 2014

New York, New York

UNITED STATES BANKRUPTCY JUDGE

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